

From: Pellegrino, Frank [fpellegrino@crsreps.com]
Sent: Thursday, June 21, 2018 7:27 PM
To: roofproducts@energystar.gov
Subject: ENERGY STAR Roof Products Sunset Proposal

To whom it may concern,

As a member of the professional roofing community for many years, I am certainly in favor of sunsetting the Energy Star designation.

I agree with the EPA's assessment that commercial building codes have now increased roof insulation R values to levels that minimize the effects of roof membrane color on a building's performance. Unfortunately many folks install white Energy Star roofs in an effort to be "green". This concept of the Energy Star rated roof has helped bolster the idea that these people are doing the right thing by installing a white roof regardless of the building's location. In reality, many people up north suffered a heating penalty and ended up making their buildings less efficient by installing an Energy Star roof. Additionally, a smaller percentage experienced condensation issues that weren't nearly as common when darker membranes were more prevalent.

My hope is that future codes and requirements will not take such a broad approach by applying a simple rule (like a white roof is best everywhere) to all areas of the country. One thing we've learned in the last twenty years is that insulation has a significant impact on a flat roof's performance, and the best color membrane for a particular building varies by geographical location.

I'll look forward to this program's sunset.

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